

United States Courts  
Southern District of Texas  
FILED

MAR 09 2021

IN THE UNITED STATES DISTRICT COURT

FOR THE

Nathan Ochsner, Clerk of Court

SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

OLGA P. BLAKLEY, M.D., P.A.,

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NO. 4:20-cv-02962

NATALIE BLAKLEY, AND

\*

JULIA BLAKLEY

\*

VERSUS

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JUDGE GEORGE HANKS, Jr

\*

NORMAND F. PIZZA AND

\*

MILLING BENSON WOODWARD LLP

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MAGISTRATE JUDGE EDISON

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**PLAINTIFF OLGA P. BLAKLEY, M.D., P.A., MOTION TO RECONSIDER**

**AND ALLOW DISCOVERY**

TO THE HONORABLE JUDGE OF THIS COURT:

NOW INTO COURT, comes Plaintiff Olga P. Blakley M.D., P.A., et al, and is respectfully

requesting to reconsider and allow discovery in the abovementioned case, in accordance with the right for the trial by jury as the case has been filed and paid for (Not for the unilateral decision and disposition by the judge).

The Plaintiff is objecting to mishandling due to severe continuous discrimination, bias and violation of the civil and constitutional rights, including guaranteed by the Constitution right for Equal Protection.

1. Plaintiff (minority woman) was not allowed Electronic filing as other Pro Se Litigants (men) were allowed, as documented in the recorded on December 17, 2020 Pre-Trial Conference. This is a gender discrimination.

2. Other Pro Se litigants were allowed convenience of electronic filing via 2 (two) different means – via email and via submission on Pacer (even without having severe health problems reported to the Court) – as evidenced and documented in the recorded Pre-Trial Conference held by Judge Edison on December 17, 2020. However, the Plaintiff up to date has Not been allowed convenience of electronic filing submission to this same Court, despite having filed a written request for such electronic submission, and despite having suffered near Lethal Heart Attack – this is unspeakable, unthinkable, unexplainable discrimination, with bias in favor of the Defendants (professional lawyers); making it much more difficult for the Plaintiff to participate in the case, and creating additional stress on the Plaintiff.
3. In this modern society of the United States of America in 21-st century, with developed electronics, Defendants (lawyers) being allowed to file All of Their Legal Filings Electronically – but the Plaintiff (a Pro Se litigant) was Not allowed Electronic filing even in ileu of national disaster of COVID pandemic, and was forced to file in person. This is uncomprehensible, biased and discriminatory handling of Judge Edison in apparent favor of Defendants – lawyers.
4. Judge Edison has been apparently biased in favor of his legal profession colleagues – Defendant lawyers Pizza, and Milling, Benson. During Pre-Trial Conference, the legal jargon discussion was about “Pretty Vanilla Case” presentation by the lawyers, with the Plaintiff, being Pro Se litigant without legal education, could not present any “Pretty Vanilla Case”, as this is a heart-breaking case with near death heart attack experience, caused by the stress, pain and suffering caused by the Defendants; and near-complete

destruction of family, children's lives and finances; caused by the Defendants.

5. Plaintiffs submitted Unopposed Motion to Continue, as the Defendants were "indifferent" and did not oppose to the Motion to Continue Due to Heart Attack – but apparently biased Judge Edison did not grant even Unopposed motion to continue due to personal tragedy of the Plaintiff – as there is nothing is much worse of the personal tragedy, as tragedy having Near Death personal heart attack, that Plaintiff had during the course of this case, that was not considered or respected by Judge Edison, despite his own promise (as evidenced and documented in the recording of the Pre-Trial Conference on December 17, 2020) – to consider and allow additional time in consideration of even "the holiday season" of Christmas, or "personal tragedy" – as the Plaintiff had in this case – but was not respected or considered by Judge Edison despite his own promise. Plaintiff had requested to allow continuance to allow time for recovery after the heart attack to be able to participate in Pre-Trial conference at the later date, but Judge Edison did not allow to move the date of Pre-Trial Conference, so Plaintiff could not participate due to fear to lose own life in case of possible re-infarction in case of stress of participation in the stressful event. That is another unhuman, unthinkable, unexplainable example of bias and discrimination by Judge Edison.
6. Therefore, the handling of this case should be reconsidered, and reassigned to another Judge.

**Respectfully submitted,  
Olga P. Blakley M.D., P.A. et al  
on 3/8/21 via in court submission  
(electronic submission has not been**

**allowed yet to a Pro Se Litigant -  
Woman after a Heart Attack)**

*Pro Se*

**s/Olga P. Blakley**

**Olga P. Blakley M.D., P.A.**

*Pro Se*

**c/o William R. Pakalka**

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Cc – via Email

Chadwick W. Collings

**Certificate of Conference:**

On this 8-th day of March, 2021 this motion was communicated to the opposing  
counsel Mr. Chadwick Collins.

**s/Olga P. Blakley**

**Olga P. Blakley M.D., P.A.**

*Pro Se*

**Certificate of Service**

I served foregoing to Defendants on this 8-th day of March, 2021 via First Class US mail.

**s/Olga P. Blakley**

**Olga P. Blakley M.D., P.A.**

*Pro Se*